# LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT EIR

A draft version of this EIR was circulated for public review from December 2, 2010 to January 17, 2011. The following is a listing of the name and addressed of persons, organizations, and public agencies that commented during this public review period.

FEDERAL AGENCIES	ADDRESS					
None						
STATE AGENCIES	ADDRESS					
None						
COUNTY, CITY, AND OTHER LOCAL AGENCIES	ADDRESS					
None						
ORGANIZATIONS	ADDRESS					
ORGANIZATIONS  San Diego County Archaeological Society, Inc.	ADDRESS  P. O. Box 81106 San Diego, CA 92138					
·	P. O. Box 81106					
San Diego County Archaeological Society, Inc.	P. O. Box 81106 San Diego, CA 92138 8424 Santa Monica Boulevard, Suite A-592					

None

DPLU - PPCC



## San Diego County Archaeological Society, Inc.

Environmental Review Committee

13 December 2010

To:

Mr. David Sibbet

Department of Planning and Land Use

County of San Diego 5201 Ruffin Road, Suite B San Diego, California 92123-1666

Subject:

Draft Environmental Impact Report

West Lilac Subdivision TM 5276, Log No. 02-02-002

Dear Mr. Sibbet:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendix G, we agree with the impact analysis and mitigation measures as presented.

Thank you for the opportunity to participate in the County's environmental review process for this project.

Sincerely,

Fames W. Royle, Jr., Chairperson
Environmental Review Committee

cc:

ASM Affiliates SDCAS President

File

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

A-1

Letter A San Diego County Archaeological Society, Inc. December 13, 2010

A-1 This comment states that the San Diego County Archaeological Society (SDCAS) has reviewed the cultural resources section of the Draft EIR and cultural resources technical study. SDCAS agrees with the impact analysis and mitigation measures presented. Since this comment does not contest the conclusions contained in the cultural resources section of the EIR, no further response to this comment is necessary.

From: Dan Silver [mailto:dsilverla@me.com]
Sent: Thursday, December 16, 2010 3:24 PM

To: Sibbet, David Cc: Grunow, Richard

Subject: DEIR for West Lilac Subdivision, TM 5376

December 16, 2010

David Sibbet Dept of Planning and Land Use 5201 Ruffin Rd, Suite B San Diego, CA 92123

RE: DEIR for West Lilac Subdivision TM 5276

Dear Mr. Sibbet:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. This project proposes the subdivision of 93 acres of organic commercial agricultural groves into residential estate lots and relatively small areas of continued agriculture. It typifies the proliferation of development that is maximally greenhouse gas-intensive and housing that is unaffordable. It also typifies the ongoing loss of scenic and natural resource values.

B-1 B-2

In a "once in a blue moon" occurrence, the County's LARA model has output a significant impact to agriculture, on the narrow basis of a soil type. As you know, the model brazenly treats the vast bulk of San Diego County's productive farmland as insignificant and virtually never requires mitigation. While this proposed project contains 23 acres of Agricultural Open Space easement in disparate locations, the majority of the site is given over to estate residential development. For both this project and the projects analyzed in the cumulative analysis, the underlying assumption for the subdivision of commercial farmland into residential estates being insignificant is that the backyard cropland will still be "available" for agriculture.

B-3

"Availability" does not mean *actual continued* agriculture. Rather, it is speculation. It is not enough to say that there are many small farms in San Diego County. Rather, the County should analyze similar prior subdivisions of simiar land into residential estate lots of this size and determine how much acreage is in production 5 years or more later. Despite the numerous cases of such subdivision, *the County has never done the proper analysis*. Other than the direct loss of soils through development (houses, roads, yards, outbuildings, stables, pools, driveways), additional factors the County should consider include the number of new residents who will choose to farm *at all*, the number who will farm a reduced acreage compared to existing, and the number who will be successful in farming and actually market a product. All this must be compared to the existing condition. Until the County provides actual evidence that these subdivisions result in perpetuation of agriculture by the residential commuters who replace the commercial growers, there is no basis for the conclusion of insignificance reached.

B-4

The project should be redesigned to cluster units on smaller lots and retain larger expanses in Agricultural Open Space easement. In fact, we recommend re-planning this project post-General Plan Update to take advantage of the potential Conservation Subdivision Program and accompanying rural design standards.

B-5

Sincerely,

Dan Silver, Executive Director Endangered Habitats League 8424 Santa Monica Blvd., Suite A 592 Los Angeles, CA 90069-4267

213-804-2750 dsilverla@me.com www.ehleague.org Letter B Endangered Habitats League December 16, 2010

- B-1 This comment states that the project "typifies the proliferation of development that is characterized as maximally greenhouse gas-intensive and unaffordable." This is not an accurate characterization of the project. First, the project proposes a reduced number of lots compared to what would be allowable under the current General Plan and zoning designations (28 lots instead of 41). The current General Plan designation is (19) Intensive Agriculture, which allows for a minimum lot size of two acres on sites with less than 25 percent slope. Slopes on the project site are less than 25 percent permitting up to 41 dwelling units under the current General Plan. The project site is currently zoned A70 (Agriculture). The A70 zoning designation permits residential development on minimum lots sizes of two acres authorizing up to 41 dwelling units on the project site. Thus, the project does not represent a "maximally intensive" project, as stated in this comment. Further, a greenhouse gas analysis was prepared for the project by a County-approved technical consultant and is included as Appendix E and summarized in Section 3.1.2 of the Draft EIR. The analysis determined that construction-related greenhouse gas emissions would be 346 metric tons/year, which is well-below the 900 metric ton/year threshold established by the California Air Pollution Control Officers Association (CAPCOA) for requiring further analysis and mitigation of greenhouse gas emissions. Operational emissions were estimated to be 860 metric tons/year, which is also below the 900 metric ton/year CAPCOA threshold. With regard to the affordability of the project, the price of the lots will be driven by market factors. The proposed lot areas are consistent with existing development in the area, as shown on Figure B-1, attached at the end of this response.
- B-2 This comment states that the project represents an ongoing loss of scenic and natural resources. No scenic resources are located on the project site and the project does not significantly impact any scenic vistas in the area (EIR pp. 3.1.1-2 through 3.1.1-5). The project site is not visible from any scenic highways (EIR p. 3.1.1-5) and it is only minimally visible from any public vantage points in the vicinity. Accordingly, the project does not result in the loss of any scenic resources and no visual impact to any scenic resources will occur from the project.

The project does not result in the loss of any natural resources. Based upon multiple field surveys, no sensitive or protected plant or wildlife species occur on the project site (EIR p. 3.1.3-7). A wetlands survey completed in 2009 established that the project site does not contain any County Resource Protection Ordinance (RPO) wetlands or any United States Army Corps of Engineers (USACE) wetlands (EIR p. 3.1.3-3). Since the project site does not contain any sensitive or protected habitat or species the project does not cause the loss of any natural resources.

B-3 The County's Guidelines for Determining Significance to Agricultural Resources ("Guidelines") requires the use of the Local Agricultural Resources Assessment Model or LARA model. The LARA model requires an evaluation of a site's significance, by analyzing six factors, divided into three required and three complementary factors and does not base agricultural significance solely on soil type as suggested by the comment. The three required factors are: water resources; climate or sunset zones; and Farmland Monitoring and Mapping Program (FMMP) soils. The three complementary factors are: surrounding land uses; land use consistency; and topography. As related to the subject development, these six factors were analyzed in Attachment A to the agricultural resources report for the project (Appendix C of EIR). The LARA model determined that the site is an important agricultural resource as two required factors (climate and water

ratings) are high and one required factor (soil quality) is moderate, while all three complementary factors (surrounding land uses, land use consistency and topography) were rated as high. Based on these determinations, the site is considered an important agricultural resource using the LARA model. Currently, 90.9 acres of the 92.8-acre project site are under agricultural production. After construction of the project, 58.5 acres of existing agricultural uses will remain on a majority of the site, with 22.6 acres of that preserved in perpetuity within the Agricultural Open Space easement.

The analysis contained in the FEIR indicates that the project will impact 6.0 acres of Statewide Significance Soils consisting of the Placentia sandy loam (PeC) soils onsite. Based on the Guidelines, this project must mitigate for the loss of this agricultural resource (the PeC soils), at a preservation ratio of 1:1. The project proposes to preserve 13.8 acres of the existing PeC soils, within an Agricultural Open Space easement, which substantially exceeds the required 1:1 ratio (EIR p. 2.2-5). In addition to that acreage, an additional 8.8 acres of non-FMMP soils will be added to the agricultural easement to make a total of 22.6 acres. This 22.6-acre agricultural easement area includes land that is in current agricultural production and that will be required to be maintained available for agriculture. The easement will also require the existing groundwater wells and irrigation system to be maintained and used for continued agricultural production. Together with these easement requirements, the presence of high quality agricultural soils and existing agriculture within the easement area and similar mixed residential and agricultural land uses in the vicinity of the project site all encourage continued agricultural production on the project site. Therefore, this project mitigates its direct impacts to agricultural resources, as required by the County's Guidelines and CEQA. Please see response B-4, below, for an additional discussion of the effectiveness of this mitigation.

The cumulative agricultural impact analysis evaluated cumulative agricultural impacts both within an 8,000-acre study area surrounding the project site, and regionally. The analysis of other anticipated development in the area demonstrated that these developments either did not impact agriculture or had avoided, minimized, or mitigated their impacts on agriculture as discussed in the agricultural resources report (EIR Appendix C, pp. 5-2 through 5-7) and cumulative impacts were determined to be less than significant. On a regional basis the 2009 San Diego County Crop Report indicated 307,292 acres of land in agricultural production compared to 172,272 acres in 1998, an increase of 78 percent. This measures land actually in agricultural production and not land that might be available for agricultural production. Cumulative agricultural resource impacts are less than significant.

B-4 Both the 2008 and 2009 County Crop Reports show that a majority of agricultural production in San Diego County occurs on property that is between one and nine acres in size (68 percent both years), with the median acreage remaining at four acres. Both the San Diego County crop reports and the County Agricultural Guidelines document that economically viable agricultural production has existed for many years on small lot sizes, with 77 percent of the farmers living on the same property as the agricultural operation. Based on the 2008 and 2009 County Crop Reports, 68 percent of farmers continue to operate farms, on lot sizes less than ten acres. Further, within the project vicinity, there are existing one- to nine-acre lots that contain both residential and agricultural production, which by their existence supports the conclusion that owners continue to maintain agriculture on smaller lot sizes in this area. As shown on Figure 12 of EIR Appendix C, ZOI Parcel Sizes, approximately 88.8 percent of the lots within the project vicinity consist of mixed use agricultural and rural residential uses. These combined rural residential and agricultural lots are found at Lilac Road, Aqueduct Road and the surrounding private roads.

The agricultural analysis contained in the EIR and the agricultural resources report evaluated remaining agricultural resources both within the 8,000-acre study area surrounding the site and regionally throughout San Diego County based upon their impacts to agriculture. A total of 41 projects were analyzed within the 8,000-acre study area. This analysis indicated that 26 projects within the 8,000-acre study area did not impact agriculture at all (EIR Appendix C, pp. 5-2, 5-3). The remaining 15 projects within the 8,000-acre study area were also examined for their agricultural impacts. This analysis indicated that the remaining 15 projects were designed in a manner to avoid or mitigate their agricultural impacts so that no cumulatively significant agricultural impacts would occur (Appendix C, p. 5-9).

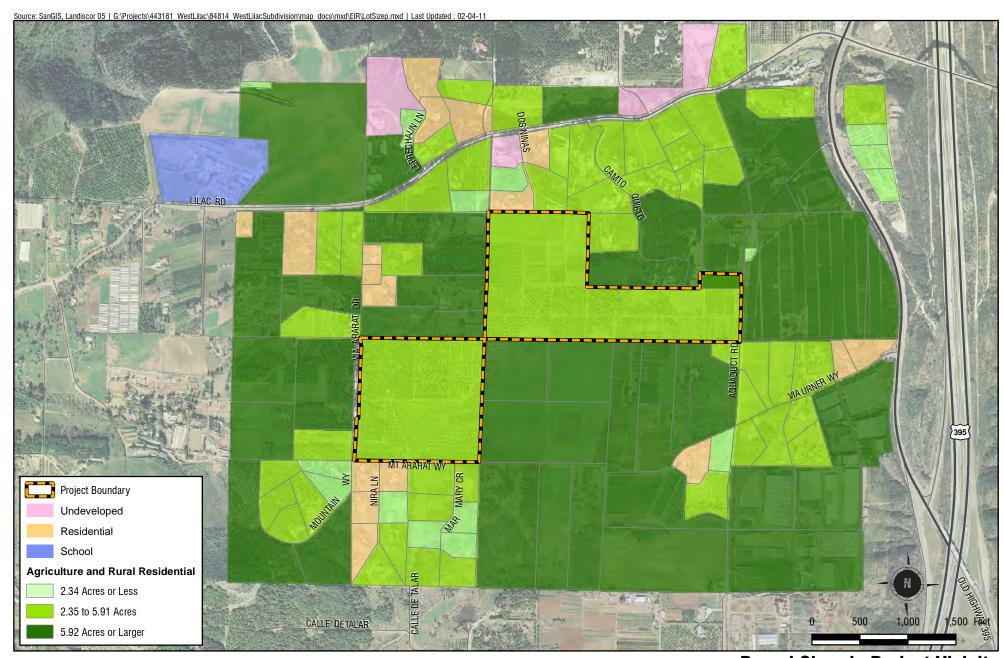
The comment indicates that the County should analyze similar projects over the last five years to see how much land has remained in agricultural production. This issue was examined in detail in the agricultural report for the project and in the San Diego County crop reports discussed as part of the agricultural report. The agricultural report notes that avocado and citrus orchards are located to the west, north, and south of the site many having parcel sizes of less than 5 acres. Flowers and other nurseries are located to the west, south, and east of the site within a mixture of rural residential and agricultural uses (Agricultural Report p. 1-8). The agricultural report notes that the "surrounding area exhibits a pattern of successful small agricultural operations in combination with rural residential development." The median lot size of the surrounding agricultural operations is approximately 3.7 acres, while the median lot size of the project is 3.3 acres, a difference of 0.4 acres. This area has successfully grown a variety of agricultural products for many years on these smaller parcels (Agricultural Report p. 2-4). Approximately 67 percent of surrounding properties within a quarter mile of the project site are established mixed agricultural and residential uses (Agricultural Report p. 3-1). 13 of the 15 projects examined in the cumulative study area are designed in a manner that retains agricultural uses in conjunction with rural residential development (Agricultural Report p. 5-9).

Figure 12 included as part of the agricultural report shows that 645 acres of the 727 acres surrounding the project site or 88.8 percent consist of mixed agricultural and rural residential uses that have existed in this area for many years. A similar pattern of successful farming in conjunction with rural residential uses emerges from an examination of the San Diego County crop reports which measure agricultural production on a regional basis throughout the County. The 2008 San Diego County Crop Report notes that 63 percent of San Diego farms are one to nine acres with 77 percent of the farmers living on their land (Agricultural Report p. 2-4). Between 1998 and 2008, the area in agricultural production in the County increased from 172,262 to 312,766 acres, an increase of 81 percent (Agricultural Report p. 2).

For the five year analysis requested by the commenter, areas in agricultural production on a regional basis were examined for the period from 2004 to 2009 based on data contained in the 2004 and 2009 San Diego County crop reports. The 2004 San Diego County Crop Report indicates there were 266,434 acres of land in agricultural production in 2004. The 2009 crop report indicates there were 307,929 acres in agricultural production within the County in 2009 representing a 15 percent increase in agricultural uses over this 5 year period. According to the 2007 San Diego County Crop Report, 68 percent of County farms are 1 to 9 acres in size; with the median being 4 acres and 92 percent of these farms are family-owned with 77 percent of farmers living on their land (Agricultural Report pp. 5-8, 5-9). The five year statistical data and the typical size and live-on status demonstrates that there is a high probability that the agricultural resources on this project will remain viable, especially considering the availability of low-cost groundwater and an agricultural manager.

B-5 A Clustered Design Alternative was evaluated in the EIR. This alternative would develop 28 clustered lots with an average lot size of approximately 1.5 acres and a 39.4-acre agricultural area on-site. However, this alternative results in significant visual impacts because it is not consistent with the visual character of the surrounding areas which consists of rural residential land uses on larger lots mixed with agricultural uses. This alternative also results in significant land use impacts since it proposes parcel sizes averaging approximately 1.5 acres which is substantially below the 3.7-acre medium parcel size in the area and it is not consistent with the third residential policy/recommendation in the adopted Bonsall Community Plan which states that clustering shall be discouraged unless overriding justification can be established for it in a specific case. Overriding justification may be found if a clustered project will protect rural community character, or when the use of clustering would preserve sensitive resources or reduce visual impacts, provided that adverse impacts to any of these three factors are minimal or mitigable. In any case, no future lot created in Bonsall may be smaller than 2 acres in a 4-acre zone or smaller than 1.5 acres in a 2-acre zone and no clustering shall be permitted in a 1-acre zone. The total number of lots proposed to be smaller than that required by the zone shall be limited to only those necessary to reduce grading and to preserve steep natural slopes and environmental resources on the site.

The Conservation Subdivision concept, which is being considered as part of the General Plan Update, cannot be utilized for this project. The Conservation Subdivision concept proposes amending the County's subdivision ordinance to include provisions for protection of environmental resources and establishing a percentage of these resources to be avoided for Semi Rural 10 and lower densities. The project site presently consists of two parcels (127-290-05 and 127-271-28). Under the General Plan Update, the larger western parcel (127-271-28) would be designated Semi Rural Residential 4 (SR-4) and the small eastern parcel (127-290-05) would be designated Semi Rural Residential 10 (SR-10). The Conservation Subdivision concept could not be used for the larger western parcel given its SR-4 designation. In addition, the project site does not contain any sensitive or protected habitat or species or steep slopes lands that would qualify for a Conservation Subdivision under the General Plan Update.





Parcel Sizes in Project Vicinity
Figure B-1

## Via Ararat Drive Association

7727 Mt. Ararat Way Bonsall, CA 92003 January 10, 2011

County of San Diego Department of Planning and Land Use 5201 Ruffin Road, Suite B San Diego, CA 92123-1666

RE: Draft Environmental Impact Report Project EIR West Lilac Tentative Map TM 5276 / Log No. 02-02-002 SCH No. 2006091067

Dear Sirs,

The following concerns should be addressed and/or corrected in the EIR for TM5276:

1.	The project HOA Agreement needs to be written and available before this EIR is approved by the Bonsall Sponsor Group and the County DPLU. This EIR states many things for which the HMO is responsible (e.g. see Table 1-1, Fire Safety, pp 1-25, 1-26, and 1-27) but there is nothing stating how the HMO will operate, nor collect the assessments, nor about its bi-laws, nor the written CC&R's.	C-1
2.	The Fire Protection Plan (pp 1-2 and 1-3) for the .5 acre and 8 acre areas "will be maintained by the HMO, underlying property owners, or by a developer/HMO – created funding mechanism." What are these three alternative bodies and who will be responsible needs to be defined (see item #1 above).	] C-2
3.	Transportation/Traffic requirements that are to be completed to Via Ararat Drive are missing in the EIR and should be included on p 1-28 and p 1-2.1-7:	] C-3
	<ol> <li>The existing S-curve on Via Ararat Drive is to be straightened (see Preliminary Grading Plan p. D-4 of Traffic Study).</li> </ol>	] C-4
	<ol> <li>The slope on the west side of Via Ararat Drive where the S-curve now exists (and is to be straightened) is excessively steep and should require a guard rail.</li> </ol>	C-5

C-6

C-7

- 4. The intersection of Via Ararat Drive and West Lilac Road is very dangerous and should be corrected by the County of San Diego:
  - i Five percent (5%) of the west bound traffic on West Lilac Road will not be able to stop before it gets to the intersection as shown in the Traffic Study. The Site-Distance Analysis of the EIR (p 2.1-6) states that there is 220 foot of site-distance looking from west to east from this intersection. The Traffic Study shows that 5% of the westbound traffic on West Lilac Road was travelling at 40 mph (p D-2 of Traffic Study). The stopping distance at 40mph is 241.8 feet (see p 2.1-20 for this equation). Therefore, 5% of the traffic would not be able to stop if there were a child or vehicle in this intersection.

Accidents like this have happened here before. On August 9, 2006 at 10:20 AM an EDCO trash truck was crossing from the blind driveway on the right to Via Ararat Drive on the left and a westbound car on West Lilac Road ran into the trash truck and wedged under it. The driver of the car had to be cut out of the totaled car. A left hand turn lane and an acceleration lane (beyond the intersection) was of no help.

- ii School Bus Stop analysis (p 2.1-6) stipulates that "Students currently picked up from this bus stop are located south of West Lilac Road and do not walk on West Lilac Road to access the stop." This statement makes the assumption that the residents north of West Lilac Road do not have, or will never have, school age children who use the bus. However, this analysis also ignores that the Sullivan Middle School is 1000 ft. west of this dangerous intersection and that children living south of West Lilac Road must cross West Lilac Road twice a day.
- Figure 1-1 shows "Proposed Agricultural Open Space Easement" lines covering the corner of Via Ararat Drive and Mt. Ararat Way (Lots 5 & 6). Figures 1-3, 1-5, and 2.2-1 do not show the same coverage.
- 6. Fuel modification treatments are stipulated outside the development (Figure 1-4); therefore, the words "within this development" (bullet #13, p 1-26) should be replaced by "required for approval of this development".
- 7. Marquart Ranch, Site #11, is missing from Figure 3.1.1-1.

Sincerely,

Robert E. Drowns

President, Via Ararat Drive Association

cc: Jim Pardee

Robin Zook, Secretary

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#### Letter C Robert Drowns, Via Ararat Drive Association January 10, 2011

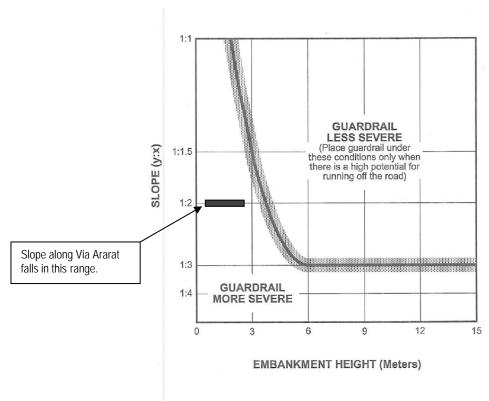
- C-1 County approval of the project does not require that the CC&Rs be written and available for review by the Bonsall sponsor group and the County Department of Planning and Land Use (DPLU). The EIR's mitigation measures contain adequate design considerations and mitigation and do not solely require performance by the Homeowner's Association (HOA).
  - The fuel management zone easements will be identified on the Final Map and are separately enforceable against the future property owners or the HOA.
  - The requirements for maintenance of the fuel management zone are separately enforceable against the future property owners or the HOA pursuant to both the Final Map and the accepted Fire Protection Plan.
  - The Tentative Map will require fuel management zones and requirements for maintenance to be identified on the grading plans.

The fuel management zones contained in the EIR are required to be shown on the grading plans and specify that "no occupancy permit for any structure shall be issued until all the required fuel modification zones specified in Figures 1-3 and 1-4 are established" (EIR pp. 1-26, 1-27). These provisions ensure that all the fuel modification zone requirements will be met since these conditions must be satisfied by the future property owners even if an HOA is not formed.

- C-2 The reference to pages 1-2 and 1-3 in this comment relate to the Fire Protection Plan, which formed the basis of the fuel management conditions. The .5 and 8-acre areas referenced in the comment are for off-site fuel management zones. The Fire Protection Plan indicates that these off-site fuel management zones for the project are south of Lots 20 and 21. A condition of the Tentative Map will require dedication of fuel management zone easements over these areas to the County of San Diego prior to the recordation of the Final Map (EIR p. 1-26). The dedication of these easements to the County ensures that the County has the ability to enforce this off-site fuel management zone area. The fuel management zone easements also require that these off-site fuel management zones be maintained either by the HOA or the underlying property owner. It is not necessary to specify which of these two alternative methods will be used to satisfy the requirement, since the requirement has to be satisfied either by a property owner or the HOA. No occupancy permit will be granted until all required fuel management zone easements are dedicated.
- C-3 This comment provides an introduction to specific traffic comments covered under comments C-4 through C-5. Please see responses, below.
- C-4 Currently, there is a minor S-curve shift in the alignment along Via Ararat Drive adjacent to future Lot 8. The project will straighten the S-curve alignment. As noted on page 1-28 of the EIR, the project's improvements to Via Ararat Drive will include widening to 22.5 feet of pavement placing a four-inch white edge line along each side of the roadway, and placing delineators or reflective marking at each power pole along Via Ararat Drive. The minor S-curve will be corrected as part of the widening of Via Ararat Drive. These improvements will be required as a condition of the Tentative Map.

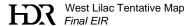
C-5 Guardrails are a safety system installed to reduce the severity of run-off road accidents. This is accomplished by redirecting a vehicle away from embankment slopes or fixed objects and dissipating the energy of the errant vehicle. However, a guardrail will reduce accident severity only for those conditions where striking the guardrail is less severe than going down an embankment or striking a fixed object.

According to Chapter 7 of Caltrans' Traffic Manual "Traffic Safety Systems" (Section 7-03.1) guardrails should only be installed where it is clear that accident severity will be reduced or there is a history of run-off-the-road accidents at a location<sup>1</sup>. The Equal Severity Curve (ESC) chart, shown below, provides guidance on when a guardrail should be considered<sup>2</sup>. After improvements to Via Ararat are completed, the portion of Via Ararat identified in this comment will have a 1:2 slope and an embankment height of less than 3 meters (9.8 feet). When plotted on the ESC chart, it shows that a guardrail is likely to cause a more severe accident. Therefore, a guardrail is not recommended or required in this location and was not identified as a project design feature in the EIR.



C-6 New intersections and roadways are typically designed for the design speeds identified in the public roads standards. Where it is impractical to do so, such as at many existing intersections such as West Lilac Road and Via Ararat Drive, through the design process a design exception and use of the 85<sup>th</sup> percentile speed has been approved for the adjusted design speed of the roadway. The County of San Diego has identified West Lilac Road as a 2.2 E Light Collector roadway, with the minimum design speed of 40 miles per hour (mph). The County of San Diego Public Road Standards also identify the corner sight distance to be provided based on the higher of the design speed or the prevailing 85<sup>th</sup> percentile speed. For West Lilac Road and Via Ararat the

<sup>&</sup>lt;sup>2</sup> http://www.dot.ca.gov/hq/traffops/signtech/signdel/pdf/TMChapter7.pdf (Figure 7-1)



<sup>&</sup>lt;sup>1</sup> http://www.dot.ca.gov/hq/traffops/signtech/signdel/pdf/TMChapter7.pdf (Section 7-03.1)

design speed is 40 mph and requires 300 feet of stopping sight distance and 400 feet of corner sight distance for level terrain. To satisfy the above requirements the County of San Diego has previously approved an exception to the road standards to road conditions for TPM 20541 located on Via Ararat south of West Lilac Road to satisfy the design speed and corner sight distance requirements. The design speed and corner sight distance approval reduced the sight distance along West Lilac Road to 220 feet east of Via Ararat plus the requirements to provide an acceleration lane. With the acceleration lane of 132 feet, a total of 352 feet of corner sight distance and stopping sight distance for westbound traffic on West Lilac Road approaching Via Ararat has been provided and satisfies the County's design standards. A copy of the approved design exception is presented in Appendix I, Page I-1 of the Traffic Study for the project (EIR Appendix B).

The 85<sup>th</sup> percentile travel speed observed for westbound traffic on West Lilac Road at Via Ararat Drive was 36 mph. The 40 mph speed referenced by the commenter is also the County's design speed for the roadway. If a vehicle were to make a northbound left turn from Via Ararat Drive onto westbound West Lilac Road it would enter into the 132-foot long acceleration lane prior to merging into the westbound through traffic on West Lilac Road. Thus the vehicle traveling westbound on West Lilac Road would have a total of 220 feet from the time they first saw the vehicle exiting Via Ararat Drive plus the additional 132-feet from the acceleration lane, or a total of 352 feet to stop (this distance does not include the transition lane which would increase the total stopping distance to 380 feet) prior to coming into contact with the vehicle that exited from Via Ararat Drive. As the commenter noted, at a speed of 40 mph the driver would need approximately 242 feet to come to a complete stop. Thus drivers would have adequate time to stop before coming into contact with the conflicting vehicle or pedestrian situated at the intersection.

Finally, the County does not agree with the assertion that the intersection of Via Ararat Drive and West Lilac Road is very dangerous. Accident reports for this intersection do not support this statement. There has been one reported accident in the last five years. The one accident occurred in February 2005 and was due to driver error in making a left turn movement and not a lack of adequate sight distance. The accident report for West Lilac Road and Via Ararat Drive for the 5 year period from January 1, 2005 through November 30, 2010 is attached to these responses to comments.

C-7 In the past, the Bonsall Unified School District, which serves K-8 students, has picked up students at West Lilac Road/Via Ararat. On West Lilac Road, the school bus stop occurred only for eastbound buses on West Lilac Road, stopping on the south side of the street (west of Via Ararat). Students picked up from this bus stop were located south of West Lilac Road and did not cross West Lilac Road to access the stop. This action eliminated the bus stop that was previously located on the north side of West Lilac Road that required students to cross West Lilac Road. Based upon recent communication with the Bonsall Unified School District (February 2011), they have discontinued school bus service along West Lilac Road. The Fallbrook Union High School District, which serves grades 9 through 12, does not currently have students in the area of West Lilac Road/Via Ararat that are being served by school bus service. In the event that bus service is restarted at the intersection of West Lilac Road/Via Ararat, the school districts would review site conditions to establish a safe pick up location.

Students crossing West Lilac Road to access Norm Sullivan Middle School can be accommodated by implementing the previous bus student pick-up program which would not require the students to cross West Lilac Road. Additionally, in the future if development and/or

students occurs on the north side of West Lilac Road the District can establish an additional stop on the north side of West Lilac Road to eliminate the need for future students to cross West Lilac Road. Adequate visibility of the bus stops can be provided to enhance the safety of the students while they wait for the bus. Therefore, since the students would not be required to cross West Lilac Road there would also be a less than significant safety impact for students crossing at the intersection.

- C-8 Figure 1-1 has been revised to note the same agricultural open space easement boundary as shown on Figure 1-3 and 1-5. The revised figure is included in the EIR.
- C-9 The requested change has been made to page 1-26. This change was also carried to page 7-5.
- C-10 Marquart Ranch, Site #11, has been added to Figure 3.1.1-1. Marquart Ranch was also inadvertently omitted from Figure 1-7 and has been added. Both of the updated figures are included in the EIR.

### County of San Diego- Department of Public Works Transportation Division-Traffic Engineering Section Traffic Collision History Report

**Location: West Lilac Road/Via Ararat** 

Data Range Reported: 01/01/2005-11/30/2010

Date	Time	Location	Dist	Dir	Type of Collision	Motor Veh. Involved With	Direct. Travel 1	Move Prec. Coll. 1	Direct. Travel 2	Move Prec. Coll. 2	Primary Cause	Injury	Fat.
2/10/05	12:20	West Lilac Rd & Via Ararat Dr	0'	In Int.	Broadside	Other Motor Vehicle	West	Making Left Turn	West	Proceeding Straight	Auto R/W Violation	0	0

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